



July 26, 2004

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 99-200, Administration of the North American Numbering Plan

Dear Ms. Dortch,

On July 23, 2004, I met with the following individuals from the Wireline Competition Bureau: Carol Matthey, Deputy Chief; Vicki Robinson, Legal Counsel; and Cheryl Callahan, Assistant Division Chief, Telecommunications Access Policy Division. The purpose of the meeting was to discuss PointOne's request for Special Temporary Authority (STA) to obtain numbering resources directly from the Pooling Administrator (PA) for use in a limited, non-commercial trial of Voice over Internet Protocol (VoIP). This request is exactly the same as the one made by SBC IP and granted by the Bureau on June 17, 2004.

At the meeting, we discussed the Bureau's concerns relating to potential depletion of codes. I emphasized that these concerns are equally applicable to the trial planned by SBC IP and that because both SBC IP's trial and that proposed by PointOne was more a test of logistical and billing capability rather than technical feasibility, all non-carrier VoIP providers must be treated in a similar manner by the Commission.

PointOne agrees that the concerns regarding code depletion are valid and that the VoIP industry should be working with the Commission towards a solution. Nevertheless, because the trial is for a limited period of time and the codes would be returned upon completion of the trial, I maintained that granting PointOne's STA would serve the public interest by enabling PointOne to experiment with a more efficient means of interconnection between IP networks and the Public Switched Telephone Network (PSTN), potentially leading to the development of new and innovative VoIP services for American consumers.

If you have any questions regarding the issues raised in this letter or in PointOne's request, please do not hesitate to contact me.

Regards,

Staci L. Pies

cc: Carol Matthey
Cheryl Callahan
Vicki Robinson